

Chief Magistrate Judge Mary Alice Theiler

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JUN 18 2014

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY _____ DEPUTY

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

KESHAV MUKUND BHIDE,

Defendant.

CASE NO. **MA14-245**

COMPLAINT for VIOLATION

Title 18, U.S.C. Section 875(c)

BEFORE, Mary Alice Theiler, Chief United States Magistrate Judge, U. S.
Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT ONE

(Interstate Threats)

Beginning on or about May 31, 2014, and continuing until on or about June 9, 2014, at Seattle, within the Western District of Washington, and elsewhere, KESHAV MUKUND BHIDE did knowingly and willfully transmit in interstate and foreign commerce from the State of Washington to another state, communications, to wit, one or more threats to cause serious physical injury or death to women at the University of Washington and to two other women online.

All in violation of Title 18, United States Code, Section 875(c).

COMPLAINT/BHIDE - 1

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1 And the complainant states that this Complaint is based on the following
2 information:

3 I, Michael Louis Baldino, being first duly sworn on oath, depose and say:

4 **INTRODUCTION**

5 1. I have been a Special Agent with the Federal Bureau of Investigation since
6 January 2013. Before becoming an FBI agent, I was a professional firefighter,
7 emergency medical and hazardous materials technician with Fairfax County Fire and
8 Rescue Department in Virginia. As an FBI Special Agent, I have investigated, received
9 training and have field experience investigating the diverse criminal violations over
10 which the FBI has jurisdiction, to include domestic and international terrorism, crimes
11 against children, illegal narcotics and other violations of federal statutes. I have acquired
12 knowledge and information about these offenses and the methods by which they are
13 executed, through formal and informal training, from other law enforcement officers and
14 investigators, informants, as well as through my participation in other investigations.

15 2. As a law enforcement officer, I have participated in the execution of
16 numerous arrest and search warrants, which have resulted in arrests, convictions, and the
17 recovery of evidence and contraband. I am currently assigned to the Seattle Division's
18 Domestic Terrorism Squad on the Joint Terrorism Task Force, which investigates
19 criminal violations relating to incidents of both domestic and international terrorism.

20 3. As outlined below, there is probable cause to believe that KESHAV
21 MUKUND BHIDE has engaged in violations of Title 18, U.S.C. § 875(c) (Interstate
22 Communications) and communicated through interstate commerce a threat to cause
23 serious physical injury or death to women at the University of Washington and to two
24 other women online.

25 **BACKGROUND OF INVESTIGATION**

26 4. On June 13, 2014, Detective William Bergin with the University of
27 Washington Police Department (UWPD) contacted the Seattle office of the FBI with
28 information regarding a possible mass shooter threat to the University of Washington

(UW) campus. The threat involved an unidentified Google Plus user named FOSS DARK who claimed to be a student at the UW. FOSS DARK posted comments on several YouTube videos related to Elliot Rodger, the shooter in the killing spree that occurred at the University of Santa Barbara (UCSB) on May 23, 2014. Some of the comments made by FOSS DARK were posted only a few days after the recent shootings at Seattle Pacific University (SPU) on June 5, 2014.

5. Based on the information provided by UWPD, I reviewed an exchange between FOSS DARK and YouTube user "zarkoff45" between June 6, 2014 and June 9, 2014 in the publically viewable comments portion of a YouTube video titled "Elliot Rodger: Infamy & Obscurity," located at <https://www.youtube.com/watch?v=E35YR3DGCIY>. In that exchange, FOSS DARK posted the following:

- June 6, 2014: "ohh il fuck allot of people before killing myself, wait and watch [sic]"
- June 9, 2014: "I live in seattle and go to UW, that's all ill give u. Ill make sure I kill only women, and many more than what Elliot accomplished [sic]"

6. Upon further review of FOSS DARK's public Google Plus profile, located at <https://plus.google.com/116502532697669488047>, I viewed additional threatening comments made to two women who posted YouTube videos condemning the actions of Elliot Rodger. On May 31, 2014, FOSS DARK commented that "people like u should be shot first, he killed because he was rejected from society, and you all help in doing that. There is no option [sic]," to a woman who posted a YouTube video titled "Protecting Elliot Rodger." On June 1, 2014, FOSS DARK commented "i would love to shoot a c--t like u!, FUCK OFF, NO one is INNOCENT !!!!!!! [sic]," to a woman who posted a YouTube video titled "Message to people who feel bad for Elliot Rodger."

7. On June 14, 2014, Google provided subscriber information which included the recovery e-mail address, keshav.bhide.009@gmail.com for Google Plus user FOSS

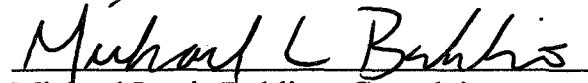
1 DARK. A search of the recovery e-mail address through FBI databases identified the
2 same email address in an F1 student visa application submitted by KESHAV MUKUND
3 Bhide to attend the University of Washington. The subscriber information also
4 included Internet Protocol (IP) addresses that resolved to the UW, which FOSS DARK
5 used to create his account and post the above mentioned comments.

6 8. With the assistance of UWPD, Bhide was contacted at his dormitory at
7 the UW on June 14, 2014, and agreed to an interview with agents. Bhide was arrested
8 by the UWPD after admitting he created the Google Plus profile FOSS DARK and posted
9 the comments. Bhide also identified the laptop he used to post the comments, which
10 was in his possession at the time of his arrest. During the interview, Bhide said he
11 commented on approximately five YouTube videos and was extremely angry with their
12 criticism of Elliot Rodger. He also said that he sympathized with Rodger's personal
13 struggles and believed it was unfair for the creators of those videos to judge his actions.
14 Bhide stated that he, like Rodger, had a hard time socializing at school and had few
15 friends.

16 9. I reviewed Google's data center location website located at
17 www.google.com/about/datacenters/inside/locations/index.html. It specifies that their
18 data centers – through which these postings would have passed – are located in Berkeley
19 County, South Carolina; Council Bluffs, Iowa; Douglas County, Georgia; Mayes County,
20 Oklahoma; Lenoir, North Carolina; Quilicura, Chile; and The Dalles, Oregon. There is
21 probable cause to believe that the comments described above involved an interstate wire
22 that traveled outside the State of Washington. YouTube is a subsidiary of Google, Inc.
23 and uses the same data centers.

CONCLUSION

10. Based on the above facts, I respectfully submit that there is probable cause to believe that KESHAV MUKUND BHIDE did knowingly and intentionally send interstate threats, in violation of Title 18 United States Code, Section 875(c).


Michael Louis Baldino, Complainant
Special Agent, FBI

Based on the Complaint and Affidavit sworn to before me, and subscribed in my presence, the Court hereby finds that there is probable cause to believe the Defendant committed the offense set forth in the Complaint.

Dated this 18th day of June, 2014.


HON. MARY ALICE THEILER
Chief United States Magistrate Judge